

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NOKIA CORPORATION and NOKIA INC.,

Plaintiffs,

v.

INTERDIGITAL COMMUNICATIONS
CORPORATION and INTERDIGITAL
TECHNOLOGY CORPORATION,

Defendants.

C.A. No. 05-16-JJF

**EXHIBITS FILED
SEPARATELY UNDER SEAL**

PLAINTIFFS' MOTION FOR LEAVE TO AMEND THEIR COMPLAINT

Pursuant to Federal Rule of Civil Procedure 15(a), plaintiffs Nokia Corporation and Nokia Inc. (collectively “Nokia”) hereby move for leave to file a First Amended Complaint. Nokia seeks leave to amend its Complaint (which currently asserts a Lanham Act claim) to plead the Lanham Act claim with more particularity, and to add claims for (i) violation of the Delaware Deceptive Trade Practices Act; (ii) common law unfair competition; (iii) intentional interference with prospective business opportunities; (iv) injurious falsehood; (v) commercial disparagement; and (vi) unjust enrichment. The grounds for this motion are set forth in Plaintiffs’ Opening Brief In Support of Motion for Leave To Amend Complaint, filed herewith.

Pursuant to D. Del. LR 15.1, attached hereto are two copies of Nokia’s proposed Amended Complaint (Exhibit 1) and a copy of the Amended Complaint indicating the respects in which it differs from Nokia’s original Complaint (Exhibit 2).

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jack B. Blumenfeld

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December 30, 2006

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D. DEL. LOCAL RULE 7.1.1 CERTIFICATION

I hereby certify that counsel for plaintiffs left voicemail messages with counsel for defendants on December 29, 2006 to advise them of this motion and to seek to confer about the subject matter of this motion, but counsel for defendants did not return the calls.

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)

CERTIFICATE OF SERVICE

I, Jack B. Blumenfeld, hereby certify that on December 30, 2006 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Richard L. Horwitz
Potter Anderson & Corroon LLP

I also certify that copies were caused to be served on December 30, 2006 upon the following in the manner indicated:

BY HAND AND E-MAIL

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